

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)
)
 Plaintiff,)
)
vs.) Case No.: 4:17-cr-578 CDP (SPM)
)
WILLIAM GUM,)
)
 Defendant.)

MOTION TO MODIFY CONDITIONS OF RELEASE

Defendant, William Gum, moves this Court, pursuant to 18 U.S.C. § 3145(a)(2), to modify the conditions of release imposed on December 14, 2017 to permit him to travel outside the Eastern District of Missouri for employment purposes only, without the prior approval of this Court. In support of this motion, Defendant states as follows:

1. On December 14, 2017, this Court admitted Defendant to bail on his own recognizance and pursuant to several conditions of release.
2. Among those conditions is condition 7(f).
3. Condition 7(f) prohibits Defendant from travel outside the Eastern District of Missouri without the prior approval of this Court.
4. Harbison Lumber employs Defendant in equipment maintenance and safety.
5. To perform his duties, Defendant travels to Harbison sites in various and changing counties.
6. Some of the sites lie outside the Eastern District.
7. As a result, Harbison requires Defendant to make occasional day trips and rare overnight trips to outside-District work sites.

8. To date, Defendant has complied with all conditions of release.
9. Defendant will notify his pretrial officer of any overnight trip he intends to make and follow all directives this Court or his officer might impose.
10. Defendant, through counsel, has discussed this matter with Assistant United States Attorney Jeannette Graviss. Ms. Graviss does not object to Defendant's request.
11. Defendant, through counsel, has also discussed this matter with Pretrial Services Officer, Michael Warren. Mr. Warren does not object to Defendant's request.

WHEREFORE, Defendant, William Gum, requests this Court modify the conditions of release imposed on December 14, 2017 to permit him to travel outside the Eastern District of Missouri for employment purposes only, without the prior approval of this Court.

Respectfully submitted,

By: /S/ Adam Fein
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CERTIFICATE OF SERVICE

I hereby certify that on March 16, 2018, the foregoing was electronically filed with the Clerk of the Court to be served by operation of the Court's electronic filing system upon Ms. Jeannette Graviss, Assistant United States Attorney.